

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSEPH CHRISTOPHER ANTHONY
MARTELL,

Defendant.

Case No. 3:24-cr-58

Defendant's Motion to Continue Trial

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1. Now comes the Defendant Joseph Christopher Anthony Martell and through his attorney Jessie L. VanCamp, as a member of the law firm of Olson, Juntunen, & Cobb, 802 Demers Ave., P.O. Box 5788 Grand Forks, ND 58206; and submits this Motion requesting that the Court continue his trial.
 2. Trial is scheduled to begin on October 7, 2025, in the U.S. District Court in North Dakota.
 3. The discovery in this case is voluminous, and there is a discovery Order in this case which prevents Counsel from providing the Defendant copies of any paper/printed discovery documents. Defendant has filed a motion seeking access to a computer to review his discovery. The Court has not ruled on this Motion as of today.
 4. This motion is made to allow the Defendant the time needed to review the discovery sought in the preceding motion, to wit: Defendant has asked the Court to provide a computer so that he may safely and securely review audio files of

proffers and phones calls which are contained in his discovery; as well as an opportunity for his own exploration of the discovery documents.

5. Defendant's request is reasonable under the circumstances. Defendant is facing numerous charges for which, if convicted, he could be sentenced to substantial time in prison. These are serious charges, and this is a serious matter. In order for Defendant to assist the undersigned in his defense, he must have an opportunity to review his discovery and discuss the same with counsel.
6. Defendant therefore requests that this Court continue the scheduled trial to allow the Defendant the time needed to review this critical discovery.

Respectfully Submitted:

Dated: September 15, 2025

/s /Jessie L. VanCamp
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